EXHIBIT C

1	IN THE UNITED STATES DISTRICT COURT
	FOR THE NORTHERN DISTRICT OF OHIO
2	EASTERN DIVISION
3	
	IN RE: NATIONAL : HON. DAN A. POLSTER
4	PRESCRIPTION OPIATE :
	LITIGATION :
5	:
	APPLIES TO ALL CASES : NO.
6	: 1:17-MD-2804
7	- HIGHLY CONFIDENTIAL -
8	SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
9	
	January 9, 2019
10	
11	
12	Videotaped sworn deposition of
13	RITA NORTON, taken pursuant to notice,
14	was held at REED SMITH LLP, Three Logan
15	Square, 1717 Arch Street, Suite 3100,
16	Philadelphia, Pennsylvania, beginning at
17	9:44 a.m., on the above date, before
18	Margaret M. Reihl, a Registered
19	Professional Reporter, Certified
20	Shorthand Reporter, Certified Realtime
21	Reporter, and Notary Public.
22	
23	GOLKOW LITIGATION SERVICES
	877.370.3377 ph 917.591.5672 fax
24	deps@golkow.com

Page 18 Page 20 ¹ affairs. 1 form. What is -- what would you -- how BY MR. CLUFF: ³ would you describe the advocacy portion of your That's another admonition I O. 4 work? ⁴ forgot to give, I'm sorry. So we have a video 5 ⁵ recording happening today, and we're also going Advocacy is kind of a standard ⁶ term that's used in all government operations. ⁶ to get a transcription of everything that's ⁷ I mean, everybody has an advocacy to represent ⁷ said, and so in order to get a clean record, a 8 them with legislators as they work on the laws, 8 clean written record, it's important that you ⁹ making the laws that govern our country and our and I and Bob all let each other have a chance ¹⁰ business and our personal lives, and so advocacy to finish our questions and answers. So after I 11 ask you a question, give Bob a second or two or 11 means we educate. 12 your counsel a second or two to interpose any So in the legal field we use the O. 13 term advocate as well, and when I'm an advocate objections that he might have. 14 for my client, I'm working on behalf of my A. Okay. client, like for my client's interests. 15 I'll do my best to give you the O. 16 Do that make sense? same courtesy and let you finish your answers 17 before I ask another question. Yes. 17 A. Okay. Veterinarians are our 18 Q. Is that the same way that the 18 A. word is used in your work? 19 19 customers too. 20 20 MR. NICHOLAS: Object to the Okay. So that's -- veterinarians would be included in the list of customers that 21 form. 22 THE WITNESS: Well, we represent AmerisourceBergen works with, okay. 23 23 our company and help educate, as I said, Earlier you mentioned that part 24 policy makers so they understand our of your work, in addition to advocacy, was Page 19 Page 21 1 business and some of the complexities of educating AmerisourceBergen's associates. 2 our business. How does your work involve 3 educating AmerisourceBergen's associates? BY MR. CLUFF: So we develop e-mails and we have 4 And when you say your business, you refer to AmerisourceBergen, correct? in our company website a link so that they can 6 Yes, AmerisourceBergen. learn about --Α. 7 So in your work when you're MR. CLUFF: Hold on one second. advocating, you're advocating for policies that Could we turn the phones off, please. are supported by AmerisourceBergen? THE WITNESS: So that they can 10 MR. NICHOLAS: Object to the 10 get updated and have information about 11 11 policies that impact our business and form. 12 12 our customers. THE WITNESS: Generally or our 13 13 BY MR. CLUFF: customers. BY MR. CLUFF: 14 Does your office ever do any 15 in-person training with AmerisourceBergen O. Who are AmerisourceBergen's associates? 16 16 customers? 17 17 Pharmacists, hospitals, A. No. manufacturers, patients. I mean, we serve 18 Have you ever conducted any everybody who receives pharmaceuticals. webinars or seminars with AmerisourceBergen 19 20 Q. So one of the things that you're associates? doing in your work is advocating on behalf of 21 A. In a limited sense. 22 AmerisourceBergen's customers as well? 2.2 How so? Q. 23 23 Well, we don't participate in A. Yes. A. 24 ²⁴ company-wide type educational like our HR MR. NICHOLAS: Object to the

1			
1	Page 22		Page 24
	department, for example. We just have set our	1	associates who live and work at these
2	asset times to provide updates on issues that we	2	operations are constituents, so elected
3	provide for interested associates.	3	official considers the business
4	Q. When you use the word	4	operations in their districts to be
5	"associates," were you referring to sort of rank	5	constituents.
6	and file AmerisourceBergen associates or anybody	6	BY MR. CLUFF:
7	employed by AmerisourceBergen?	7	Q. Does AmerisourceBergen make
8	A. Anybody employed by	8	campaign contributions to the elected officials
9	AmerisourceBergen. AmerisourceBergen refers	9	where it does business?
10	their employees as associates.	10	MR. NICHOLAS: Object to the
11	Q. Understood. Thank you for the	11	form.
12	clarification.	12	Go ahead.
13	So in educating	13	THE WITNESS: Corporate
14	AmerisourceBergen's associates then, you would	14	contributions?
15	have been responsible for educating people like	15	BY MR. CLUFF:
16	Steven Collis?	16	Q. Yeah.
17	MR. NICHOLAS: Object to the	17	A. So we do, in a very limited
18	form.	18	situations for states that do not accept PAC
19	THE WITNESS: Yes.	19	contributions, we do make small, limited
20	BY MR. CLUFF:	20	corporate contributions, but it's a very nominal
21	Q. How about AmerisourceBergen's	21	amount.
22	Executive Committee?	22	Q. AmerisourceBergen then also makes
23	A. Yes.	23	contributions through a PAC?
24	Q. You also referred to advocacy and	24	A. Yes.
	Page 23		Page 25
1	educating AmerisourceBergen's associates as well	1	Q. And what does a PAC stand for,
2	as its elected officials.		
3	as its creeted officials.	4	just so we have it on the record?
	What did you mean by		just so we have it on the record? A PAC is a political action
4	What did you mean by Amerisource Bergen's elected officials?	3	A. A PAC is a political action
	AmerisourceBergen's elected officials?	3 4	A. A PAC is a political action committee, which were formed in the '70s by the
5	AmerisourceBergen's elected officials? A. So we have operations throughout	3 4 5	A. A PAC is a political action committee, which were formed in the '70s by the government to allow employees of companies to
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5 6 7 8	AmerisourceBergen's elected officials? A. So we have operations throughout the country because we distribute pharmaceuticals anywhere in the country within 12 hours. So we are constituents of many	3 4 5 6 7 8	A. A PAC is a political action committee, which were formed in the '70s by the government to allow employees of companies to pool their resources to help educate elected officials who represent them or who have an interest in learning about their business.
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	ighty confidential - Subject to			
	Page 46			Page 48
	represents the cross-section of the healthcare	1		I don't know.
2	industry, so everything from hospitals,	2	_	You mentioned pharmacies.
3	pharmacies, insurers to pharmacies,	3		o you know which pharmacies
4	distributors. Basically, anybody in the	4		in the Healthcare Leadership
5	healthcare industry is represented or can be	5	Council?	
6	represented in the Healthcare Leadership	6	A.]	I don't know. The membership
7	Council.	7	changes, ar	nd sometimes they join and then they
8	Q. So it looks like you mentioned	8	drop out, a	nd so I don't know. At this time I
9	hospitals, pharmacies, insurers and	9	don't know	7.
10	distributors.	10	Q.]	Do you have any understanding
11	What about physicians or	11	about Rite	Aid participating in the Healthcare
12	prescribers?	12	Leadership	Council?
13	A. Possibly. You know, like Mayo	13	A.]	I don't know.
14	Clinic is a member, and also manufacturers are	14	Q	Some of these questions I have to
15	members and pharmacies.	15	_	get your understanding. I'm not
16	Q. Does the Healthcare Leadership	16	•	ick you into saying yes or no, just,
17	Council have like committees or subgroups or	17		looking in all the cupboards, so to
18	working groups?	18	speak.	
19	A. They have task forces.	19		Okay.
20	Q. Does AmerisourceBergen hold any	20		How about Walgreens, do you know
21	positions in the Healthcare Leadership Council?	21		ens participated in the Healthcare
22	A. Steve Collis is on the board, and	1	Leadership	
23	then Stacie Heller and I serve on their task	23		Yes.
	force committees or task forces.	24	Q. 1	How about Walmart?
	Page 47			Page 49
		l -		
1	Q. What task forces are those?	1		don't know.
2	A. I can't remember the names, but	2	Q. H	How about CVS?
3	A. I can't remember the names, but there's one on the uninsured. I think there's	2	Q. H A. I	How about CVS? don't know.
2 3 4	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality.	2 3 4	Q. H A. I Q. Y	How about CVS? don't know. You made an interesting point
2 3 4 5	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the	2 3 4 5	Q. H. A. I Q. Y about memb	How about CVS? don't know.
2 3 4 5 6	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council?	2 3 4 5 6	Q. H. A. I. Q. Y. about membragoing out.	How about CVS? don't know. You made an interesting point bership changing, people coming in and
2 3 4 5 6 7	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes.	2 3 4 5 6 7	Q. H. A. I Q. Y. about member going out.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or
2 3 4 5 6 7 8	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health?	2 3 4 5 6 7 8	Q. H. A. I Q. Y about members going out. I verified the other photostal in the other photo	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that
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2 3 4 5 6 7 8 9	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers	2 3 4 5 6 7 8 9	Q. H. A. I Q. Y. about members going out. I v. the other ph. Amerisource W.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or harmacy memberships that beBergen has. Fifth the NACDS, do you know how
2 3 4 5 6 7 8 9 10	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership	2 3 4 5 6 7 8 9 10	Q. H. A. I Q. Y. about members going out. I we the other phe Amerisource W. long Ameris	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or harmacy memberships that be Bergen has.
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2 3 4 5 6 7 8 9 10 11 12 13 14	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No.	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. H. A. I Q. Y. about members going out. I we the other pheadmerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource C. Y. A. M. M. A. M. A. M. A. M. M. A. M. M. A. M. M. A. M. A. M. A. M. A. M. A. M. M. A. M. M. A. M. A. M.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that beBergen has. With the NACDS, do you know how sourceBergen has been a member of the No. You've worked at beBergen since 2004.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF:	2 3 4 5 6 7 8 9 10 11 12 13	Q. H. A. I Q. Y. about members going out. I we the other phead Amerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource Do	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that be Bergen has. With the NACDS, do you know how source Bergen has been a member of the Wo. You've worked at be Bergen since 2004. To have a recollection of when
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. H. A. I Q. Y. about members going out. I we the other phe Amerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource Do you started	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or harmacy memberships that beBergen has. With the NACDS, do you know how sourceBergen has been a member of the No. You've worked at beBergen since 2004. To have a recollection of when working with the NACDS as part of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. H. A. I Q. Y. about members going out. I verified the other phamerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource Do you started your job reserved.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that be Bergen has. Fifth the NACDS, do you know how source Bergen has been a member of the NO. You've worked at be Bergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. H. A. I Q. Y. about members going out. I we the other phe Amerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource Do you started your job research. S.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that be Bergen has. With the NACDS, do you know how source Bergen has been a member of the Wo. You've worked at be Bergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership Council?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. H. A. I Q. Y. about members going out. I verified the other phamerisource W. long American NACDS? A. N. Q. Y. Amerisource Do you started your job resurce A. S. Q. S.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or harmacy memberships that beBergen has. With the NACDS, do you know how sourceBergen has been a member of the No. You've worked at beBergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004. Since 2004.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership Council? A. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. H. A. I Q. Y. about members going out. I verified the other phamerisource W. long Ameris NACDS? A. N. Q. Y. Amerisource Do you started your job resurce Q. S. So So	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or tarmacy memberships that teBergen has. Tith the NACDS, do you know how sourceBergen has been a member of the No. You've worked at teBergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004. To AmerisourceBergen potentially
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership Council? A. I don't know. Q. Do you have any understanding	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. H. A. I Q. Y. about members going out. I we the other phere and the other phere are a second with the other phere. I we the other phere are a second with the other phere are a second with the other phere. We have the other phere are a second with the other phere are a second with the other phere. A. N. A. M. A. M. A. M. A. M. A. M.	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that reBergen has. If the NACDS, do you know how sourceBergen has been a member of the No. You've worked at reBergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004. To AmerisourceBergen potentially member of the NACDS since that time?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership Council? A. I don't know. Q. Do you have any understanding about Mallinckrodt participating in the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. H. A. I Q. Y. about members going out. I verifie other ph. Amerisource. What was a series of the content o	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that be Bergen has. Fifth the NACDS, do you know how sourceBergen has been a member of the No. You've worked at be Bergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004. To AmerisourceBergen potentially member of the NACDS since that time? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I can't remember the names, but there's one on the uninsured. I think there's another one on healthcare quality. Q. Is McKesson a member of the Healthcare Leadership Council? A. Yes. Q. How about Cardinal Health? A. Yes. Q. Do you know which manufacturers are members of the Healthcare Leadership Council? MR. NICHOLAS: Object to the form, foundation. THE WITNESS: No. BY MR. CLUFF: Q. Have you do you have any understanding about Johnson & Johnson participating in the Healthcare Leadership Council? A. I don't know. Q. Do you have any understanding	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. H. A. I Q. Y. about members going out. I verifie other ph. Amerisource. What was a series of the content o	How about CVS? don't know. You made an interesting point bership changing, people coming in and want to go back to the chain or narmacy memberships that reBergen has. If the NACDS, do you know how sourceBergen has been a member of the No. You've worked at reBergen since 2004. To have a recollection of when working with the NACDS as part of sponsibilities? Since 2004. To AmerisourceBergen potentially member of the NACDS since that time?

					Confidenciality Review
		Page 50			Page 52
		on are both members during the same time	1	Executive	Committee?
2	period?		2	A.	Yes.
3	A.	Yes.	3	Q.	What are those?
4	Q.	How about the NCPA, do you know	4	A.	Board member and Executive
5		nerisourceBergen's membership started with	5	Committe	e member. It's the same person.
6	the NCP	A?	6	Q.	Who is that?
7	A.	Since before 2004.	7	A.	Bob Mauch.
8	Q.	How about the Healthcare	8	Q.	Does Mr. Mauch hold any special
9	Leadersh	ip Council, do you know when	9	positions	on either the Board of Directors or
10	Amerison	urceBergen started participating in that	10	the Execu	tive Committee?
11	group?		11	A.	I don't know.
12	A.	No.	12	Q.	So you don't know whether he
13	Q.	Do you have a recollection, based	13	might be a	a chairman of the board or a chairman
14	on your v	work with AmerisourceBergen, when	14	•	ecutive Committee?
15	=	t may have happened?	15	A.	Incoming chairman.
16		MR. NICHOLAS: Object to the	16	Q.	Of which?
17	forn	_	17	A.	The board I'm not sure. I
18		THE WITNESS: I don't remember.	18		- I should say I don't know. I know
19	BY MR.			he's	I should say I don't know. I know
20		Do you recall doing any work with	20	Q.	Do you know if he's ever held a
		heare Leadership Council before you		-	ke chairman
22		he senior vice president?	22	A.	No.
23	A.	Yes.	23	Q.	with the Board of Directors or
24	Q.	So sometime before 2014 then?		_	tive Committee?
	Q.	30 sometime before 2014 then:		me Execu	tive Committee:
		Page 51			Page 53
1	A.	Page 51 Yes.	1	A.	Page 53 He has not.
1 2	A. Q.	_	1 2		
	Q.	Yes.	2	Q.	He has not.
2	Q.	Yes. Do you know if Cardinal Health	2	Q. the Execut	He has not. Okay. Before Mr. Mauch served on
2 3	Q. was a me A.	Yes. Do you know if Cardinal Health ember at that time?	2 3 4	Q. the Execut	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive
2 3	Q. was a me A.	Yes. Do you know if Cardinal Health ember at that time? I don't know.	2 3 4	Q. the Execut positions f Committee	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive
2 3 4 5	Q. was a me A. Q.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson?	2 3 4 5	Q. the Execut positions f Committee	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held or AmerisourceBergen on the Executive e?
2 3 4 5 6	Q. was a me A. Q. A.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know.	2 3 4 5	Q. the Execut positions f Committee A. Neu.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held or AmerisourceBergen on the Executive e?
2 3 4 5 6 7	Q. was a me A. Q. A. Q. HDMA.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know.	2 3 4 5 6 7	Q. the Execut positions f Committee A. Neu. Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave
2 3 4 5 6 7 8	Q. was a me A. Q. A. Q. HDMA.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the	2 3 4 5 6 7 8	Q. the Execut positions f Committee A. Neu. Q. A.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO.
2 3 4 5 6 7 8	Q. was a me A. Q. A. Q. HDMA.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the	2 3 4 5 6 7 8 9	Q. the Execut positions f Committee A. Neu. Q. A. Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the
2 3 4 5 6 7 8 9	Q. was a me A. Q. A. Q. HDMA.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to AmerisourceBergen has been a member of or the HDMA?	2 3 4 5 6 7 8 9	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive	He has not. Okay. Before Mr. Mauch served on live Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee?
2 3 4 5 6 7 8 9 10	Q. was a me A. Q. A. Q. HDMA. how long the HDA A.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004.	2 3 4 5 6 7 8 9 10	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left
2 3 4 5 6 7 8 9 10 11 12 13	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a member of or the HDMA? Since before 2004. Do you have any knowledge about	2 3 4 5 6 7 8 9 10 11	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010.
2 3 4 5 6 7 8 9 10 11 12 13	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004. Do you have any knowledge about apployees for AmerisourceBergen	2 3 4 5 6 7 8 9 10 11 12 13	Q. the Execut positions of Committee A. Neu. Q. A. Q. Executive A. the compar	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left
2 3 4 5 6 7 8 9 10 11 12 13	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participal	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004. Do you have any knowledge about apployees for AmerisourceBergen te in the HDA?	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate?	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004. Do you have any knowledge about aployees for AmerisourceBergen te in the HDA? There's quite a few.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat A. Q.	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a member of or the HDMA? Since before 2004. Do you have any knowledge about aployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat A. Q. every sin	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a member of or the HDMA? Since before 2004. Do you have any knowledge about apployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on agle one of them, but let's talk about	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis? Our chair AmerisourceBergen's
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat A. Q. every sin some hig	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004. Do you have any knowledge about aployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on gle one of them, but let's talk about the hlights, and maybe we work our way from	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. Q. A. chairman,	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis? Our chair AmerisourceBergen's CEO and president.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat A. Q. every sin some hig	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a AmerisourceBergen has been a member of or the HDMA? Since before 2004. Do you have any knowledge about aployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on gle one of them, but let's talk about thights, and maybe we work our way from own at the HDA.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. chairman, Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left my, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis? Our chair AmerisourceBergen's CEO and president. Do you know when he held a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participat A. Q. every sin some hig the top de	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a member of or the HDMA? Since before 2004. Do you have any knowledge about apployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on gle one of them, but let's talk about hlights, and maybe we work our way from own at the HDA. So the HDA has a Board of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. Q. A. chairman, Q. position or	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis? Our chair AmerisourceBergen's CEO and president. Do you know when he held a in the Executive Committee of the HDA?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. was a me A. Q. A. Q. HDMA. how long the HDA A. Q. which en participal A. Q. every sin some hig the top de	Yes. Do you know if Cardinal Health ember at that time? I don't know. How about McKesson? I don't know. You mentioned the HDA and the Do you have any knowledge as to a member of or the HDMA? Since before 2004. Do you have any knowledge about apployees for AmerisourceBergen te in the HDA? There's quite a few. So I don't want to quiz you on gle one of them, but let's talk about hlights, and maybe we work our way from own at the HDA. So the HDA has a Board of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. the Execut positions f Committee A. Neu. Q. A. Q. Executive A. the compar Q. estimate? A. Q. A. chairman, Q. position or A. Q.	He has not. Okay. Before Mr. Mauch served on ive Committee, do you know who held for AmerisourceBergen on the Executive e? Dave Yost, Steve Collis, Dave Who is Dave Yost? Our former CEO. Do you know when he sat on the Committee? Since before 2004 until he left ny, which was 2010. Is that a guess or your best That's my best estimate. Okay. Who is Steve Collis? Our chair AmerisourceBergen's CEO and president. Do you know when he held a in the Executive Committee of the HDA?

	rightly confidencial - Subject to		
	Page 54		Page 56
1	Q. So sometime arter 2010.		the primary members as part of that.
2	A. Yes. No. I don't remember.	2	Q. You've referred to manufacturers
3	Q. Who is David Neu?	3	a couple times as customers of
4	A. Former president of the company.	4	AmerisourceBergen.
5	Q. And his last name is spelled	5	What do manufacturers purchase
6	N-e-u, correct?	6	from AmerisourceBergen that would make them
7	A. Yes.	7	customers?
8	Q. Do you know when he held a	8	MR. NICHOLAS: Object to the
9	position on the Executive Committee of the HDA?	9	form.
10	A. I don't remember the exact years.	10	THE WITNESS: We purchase
11	Q. Do you know if it was before or	11	pharmaceuticals from manufacturers.
12	after Mr. Collis?	12	They don't purchase from us.
13	A. After Mr. Collis.	13	BY MR. CLUFF:
14	Q. Do you know how long Mr. Neu	14	Q. I'm just trying to understand the
15	served on the Executive Committee of the HDA?	15	words "they" you're using today, so I'm going to
16	A. Approximately four years.	16	ask the question a little bit differently.
17	Q. Do you know when Bob Mauch	17	You've referred to manufacturers
18	started holding a position on the Executive	18	multiple times as customers of
19	Committee of the HDA?	19	AmerisourceBergen. How are manufacturers
20	A. I don't know.	20	customers of AmerisourceBergen, in your
21	Q. How about the Board of Directors,	21	understanding?
22	do you know if Dave Yost ever held a position on	22	MR. NICHOLAS: Object to the
23	the Board of Directors for the HDA?	23	form.
24	A. I don't know.	24	Go ahead.
	Page 55		Page 57
1	Q. And how about Mr. Collis, do you	1	THE WITNESS: We purchase
	·· ·· F · ·	2	pharmaceuticals from manufacturers, and
3	Directors of the UDA'		
	Directors of the fibri.	3	we aggregate them and distribute them
4	A. I don't know.	4	anywhere in the country.
5	A. I don't know.Q. How about David Neu, did he ever	4 5	anywhere in the country. BY MR. CLUFF:
5	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA?	4	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a
5	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman.	4 5	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct?
5 6	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of	4 5 6	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the
5 6 7	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA?	4 5 6 7	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering.
5 6 7 8	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board.	4 5 6 7 8	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a
5 6 7 8 9	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with	4 5 6 7 8 9	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering.
5 6 7 8 9	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA?	4 5 6 7 8 9	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to
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5 6 7 8 9 10 11 12 13 14 15	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA?	4 5 6 7 8 9 10 11 12 13 14 15	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them.
5 6 7 8 9 10 11 12 13 14 15 16	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA? A. Manufacturers have some sort of	4 5 6 7 8 9 10 11 12 13 14 15	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them. A. We view them as a customer.
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5 6 7 8 9 10 11 12 13 14 15 16 17	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA? A. Manufacturers have some sort of subsidiary or associate type of membership, but it's not policy making or it's sort of, as I	4 5 6 7 8 9 10 11 12 13 14 15 16 17	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them. A. We view them as a customer. Q. Why? A. Because we purchase
5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA? A. Manufacturers have some sort of subsidiary or associate type of membership, but it's not policy making or it's sort of, as I said, subsidiary committee almost.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them. A. We view them as a customer. Q. Why? A. Because we purchase pharmaceuticals from them.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA? A. Manufacturers have some sort of subsidiary or associate type of membership, but it's not policy making or it's sort of, as I said, subsidiary committee almost. Q. What do you mean by that? A. I just I think they just, as	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them. A. We view them as a customer. Q. Why? A. Because we purchase pharmaceuticals from them. Q. Are you aware if
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I don't know. Q. How about David Neu, did he ever hold a position with the HDA? A. Chairman. Q. Was Mr. Neu ever a chairman of the Executive Committee of the HDA? A. Chairman of the board. Q. Are you generally familiar with the membership of the HDA? A. Yes. Q. Do you know if manufacturers are member of the HDA? A. Manufacturers have some sort of subsidiary or associate type of membership, but it's not policy making or it's sort of, as I said, subsidiary committee almost. Q. What do you mean by that? A. I just I think they just, as a as a customer and a part of the supply	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	anywhere in the country. BY MR. CLUFF: Q. So that makes AmerisourceBergen a customer of manufacturers, correct? MR. NICHOLAS: Object to the form. Word bickering. THE WITNESS: We view them as a customer, but I guess it's up to you how you want to BY MR. CLUFF: Q. It's not up to me. These are your words. I'm just trying to understand them. A. We view them as a customer. Q. Why? A. Because we purchase pharmaceuticals from them. Q. Are you aware if AmerisourceBergen is selling anything to manufacturers?

	D 06	Т	D 00
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1	A. No. I mean, other members		Directors representative was?
2	might we fill in for each other in our	2	A. John Hammergren.
3	Washington office, but that's it.	3	Q. Can you spell the last name?
4	Q. You mean other members of	4	A. H-a-m-m-e-r-g-r-e-n.
5	AmerisourceBergen?	5	Q. Do you know if any pharmaceutical
6	A. If somebody if Stacie can't be	6	manufacturers held board of director's positions
7	on, somebody might fill in for her.	7	in the Healthcare Leadership Council?
8	Q. I think you mentioned that Steve	8	A. I don't I don't know.
9	Collis holds a board position with the	9	Q. How about any pharmacies, like
10	Healthcare Leadership Council; is that right?	10	
11	A. Yes.	11	A. I don't know.
12	Q. Do you know if he attends Board	12	Q. Turning to the HDA now, I know
13	of Directors meetings?		that AmerisourceBergen's overall involvement in
14			C .
			HDA is probably larger than you may know about,
15	Q. Do you know how often those are	15	so I'm just going to confine it to your work in
16	held?		the government affairs and public policy group.
17	A. Three times a year.	17	Do you know how frequently your
18	Q. Do you have an approximation of	18	staff in the government affairs and public
19	how often he is able to attend?	19	policy group attend HDA meetings?
20	A. Once or twice a year.	20	MR. NICHOLAS: Object to the form
21	Q. Do you know if Cardinal Health	21	of the question, particularly the
22	holds a Board of Directors position on the	22	characterization at the beginning of the
23	Healthcare Leadership Council?	23	question.
24	A. No. They did.	24	Go ahead. You can answer.
	<u> </u>		D 00
	Page 87		Page 89
		١	_
1	Q. At what time period did they hold	1	THE WITNESS: They're usually
1 2	Q. At what time period did they hold that position?	2	THE WITNESS: They're usually phone calls, and some are weekly, some
	Q. At what time period did they hold that position? A. 2015 to 2017.	2	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly.
2	Q. At what time period did they hold that position?	2	THE WITNESS: They're usually phone calls, and some are weekly, some
3 4	Q. At what time period did they hold that position? A. 2015 to 2017.	2	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly.
3 4	 Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member 	2 3 4 5	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF:
2 3 4 5	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings?	2 3 4 5	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls
2 3 4 5 6	 Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. 	2 3 4 5 6	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA?
2 3 4 5 6 7	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. Q. Do you know who their Board of Directors member was?	2 3 4 5 6 7	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA? A. The Federal Government Affairs
2 3 4 5 6 7 8	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. Q. Do you know who their Board of Directors member was? A. George Barret.	2 3 4 5 6 7 8	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA? A. The Federal Government Affairs Committee and the State Government Affairs Committee.
2 3 4 5 6 7 8	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. Q. Do you know who their Board of Directors member was? A. George Barret. Q. Do you know if McKesson has ever	2 3 4 5 6 7 8	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA? A. The Federal Government Affairs Committee and the State Government Affairs Committee. Q. Are those calls held separately?
2 3 4 5 6 7 8 9	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. Q. Do you know who their Board of Directors member was? A. George Barret. Q. Do you know if McKesson has ever held a board position on the Healthcare	2 3 4 5 6 7 8 9	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA? A. The Federal Government Affairs Committee and the State Government Affairs Committee. Q. Are those calls held separately? A. Yes.
2 3 4 5 6 7 8 9 10	Q. At what time period did they hold that position? A. 2015 to 2017. Q. Do you know if their board member attended Board of Directors meetings? A. Yes. Q. Do you know who their Board of Directors member was? A. George Barret. Q. Do you know if McKesson has ever held a board position on the Healthcare Leadership Council?	2 3 4 5 6 7 8 9 10 11	THE WITNESS: They're usually phone calls, and some are weekly, some are monthly. BY MR. CLUFF: Q. What are some of the weekly calls that your staff participate in with the HDA? A. The Federal Government Affairs Committee and the State Government Affairs Committee. Q. Are those calls held separately? A. Yes. Q. So between the Federal Government
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Page 318 Page 320 Q. And Julie Eddy writes, "We like Before today's deposition, did ² to say what we are 'for' instead of only ² you have an opportunity to look for some notes ³ against. We want to totally kill the opioid tax that you took during Mr. Collis' testimony ⁴ bills by pointing to our support of other before the Energy and Commerce committee? 5 bills." Α. 6 Do you see that? Q. Okay. I reviewed some of your 7 Yes. documents and I don't want to misrepresent the A. way that you conduct business, but I notice that 8 So Ms. Eddy believed it was O. AmerisourceBergen's policy to say what they were you do keep notes sometimes on documents. Is that a part of your practice 10 for so they could kill things they were against, 11 right? as a AmerisourceBergen employee? 11 12 MR. NICHOLAS: Object to the 12 Occasionally, yes. A. 13 13 Is there any particular reason form. Q. 14 THE WITNESS: I have no idea why why for the hearing in which Mr. Collis 15 she said that. I mean, she was prone to testified that you decided to keep notes? 16 saying irresponsible things. 16 Just in case there was any BY MR. CLUFF: 17 17 follow-up or anything. 18 Did you reply back and say, 18 Okay. We talked today about a Julie, that's an irresponsible thing to say? lot of other meetings and phone calls that you 19 20 No, but I probably told her that. would have been a participant in over time. 21 But it's not in this e-mail. Would it have been your practice Q. 22 right? to keep notes during any of those meetings or 23 A. No. during those phone calls? 24 Did you write her an e-mail about O. A. When? Page 319 Page 321 1 it? 1 Any time between 2004 and today. 2 2 MR. NICHOLAS: Object to the No, I don't remember this. 3 MR. CLUFF: It's about 5:00, so 3 form. we've been going another little bit of 4 THE WITNESS: It's possible. 4 5 an hour. Why don't we take a break. BY MR. CLUFF: 6 Let's come back maybe quick, though, Q. I'm not trying to get you to 7 from the break, and then I'll see if I ⁷ recall specific instances where you may have 8 have anything else. I know there's like kept notes. 9 just a couple more documents I want to I'm just wondering just as a 10 talk to you about and then just a few general practice, do you keep notes about the 11 like general, and then I think I'm going meetings and phone calls that you participate 12 to be done with the questioning for 12 in? 13 13 today. MR. NICHOLAS: Object to the 14 THE WITNESS: Okay. 14 form. 15 MR. NICHOLAS: Okay. 15 THE WITNESS: Yes, but never THE VIDEOGRAPHER: Off the 16 16 extensive. I'm just usually a few -- a 17 17 record, 5:00. few notes jotted to me for my own 18 (Brief recess.) 18 memory. 19 THE VIDEOGRAPHER: We are back on BY MR. CLUFF: 19 20 the record 5:14 p.m. 20 Q. Okay. Where would you keep those BY MR. CLUFF: 21 notes, if they existed? 21 22 Q. Ms. Norton, you're still under 22 Sometimes I write them on the oath so we'll proceed. documents that are in front of me. Sometimes I

Okay.

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write them on envelopes. Sometimes I write them